

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA

MICHAEL KLEINSASSER,)
)
Plaintiff,)
)
v.) Case No.: 16-cv-00102-M
)
PROGRESSIVE NORTHERN)
INSURANCE COMPANY,)
)
Defendant.)

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

The following parties to this lawsuit, Plaintiff, Michael Kleinsasser, and Defendant, Progressive Northern Insurance Company, pursuant to Fed. R. Civ. P. 41, stipulate as follows:

1. Plaintiff, Michael Kleinsasser, agrees and stipulates to the dismissal with prejudice of any and all claims, whether based in contract, tort, or any other theory of recovery, he has or believes he has against Progressive Northern Insurance Company, its parent companies, subsidiaries, employees, agents, and attorneys, in any way related to the accident in which he was involved on April 4, 2013, which also involved Ricky Lee Bellows, Kwick Rentals L.L.C., and Daniel Caswell, at or near the intersection of County Road NS201 and County Road EW49 in or near Woodward, in Woodward County, Oklahoma, and Progressive Northern Insurance Company's handling of the claims arising from the accident; and

2. Defendant, Progressive Northern Insurance Company, agrees and stipulates that it will forever waive and will not request and/or file any motions seeking recovery of attorney fees, costs or sanctions of any kind under federal and/or state statutes, court rules, and/or local court rules from Plaintiff, Michael Kleinsasser, or his attorneys.

All respective parties to bear their respective attorney fees and costs.

Dated this 27th day of July 2016.

s/ Dawn M. Goeres

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s/ Duke Halley

(Signed by Filing Attorney
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